

**IN THE CIRCUIT COURT OF THE
17TH JUDICIAL CIRCUIT IN AND
FOR BROWARD COUNTY, FLORIDA**

**Case No: 12-034123(07)
Complex Litigation Unit**

P&S ASSOCIATES, GENERAL PARTNERSHIP,
et. al.,
Plaintiffs,

vs.
MICHAEL D. SULLIVAN,
et al.,
Defendants.

**PLAINTIFFS' MOTION FOR AN EXTENSION OF
TIME TO FILE EXPERT WITNESS DISCLOSURES**

Plaintiffs, by and through their undersigned counsel, hereby move for an extension of time to file an expert witness disclosure, and in support thereof state:

1. Pursuant to the Court's Order Setting Pre-Trial Instructions and Calendar Call, the deadline for the parties to submit expert witness disclosure is March 10, 2016.
2. On March 9, 2016, the Court held a conference call in connection with this matter and indicated that trial in this matter would be postponed.
3. Additionally, Plaintiffs' expert witness, Barry Mukamal, is currently travelling.
4. Therefore, Plaintiffs request a brief extension of time, up to and until March 21, 2016, to submit their expert witness disclosure, if the date is not otherwise postponed by a new Order Setting Pre-Trial Instructions and Calendar Call.
5. Counsel for Plaintiffs has consulted with counsel for Defendants Avellino and Bienes. Counsel for Avellino and Bienes indicated that they consent to the relief sought.

 **BERGER SINGERMAN**

350 EAST LAS OLAS BLVD. | SUITE 1000 | FORT LAUDERDALE, FLORIDA 33301
t: 954-525-9900 | f: 954-523-2872 | WWW.BERGERSINGERMAN.COM

6. No party will suffer prejudice in the event that the Court grants the brief extension sought.

WHEREFORE Plaintiffs request this Court enter an order (i) granting Plaintiffs' an extension of time, up to and until March 21, 2016, to file expert witness designations and (ii) for such other and further relief as this Court deems just and proper.

March 10, 2016

Respectfully submitted,

BERGER SINGERMAN LLP
Attorneys for Plaintiffs
350 East Las Olas Blvd, Suite 1000
Fort Lauderdale, FL 33301
Telephone: (954) 525-9900
Facsimile: (954) 523-2872

By: *s/Leonard K. Samuels*
Leonard K. Samuels
Florida Bar No. 501610
lsamuels@bergersingerman.com
Michel O. Weisz
Florida Bar No. 336939
mweisz@bergersingerman.com
Zachary P. Hyman
Florida Bar No. 98581
zhyman@bergersingerman.com

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on March 10, 2016, a copy of the foregoing was filed with the Clerk of the Court via the E-filing Portal, and served via Electronic Mail by the E-filing Portal upon:

Peter G. Herman, Esq.
1401 E. Broward Blvd. Suite 206
Fort Lauderdale, FL 33301
Tel: 954-315-4874
Fax: 954-762-2554
PGH@thlglaw.com
ServicePGH@thlglaw.com
***Attorneys for Steven Jacob; Steven F. Jacob
CPA & Associates, Inc.***

Gary A. Woodfield, Esq.
Haile, Shaw & Pfaffenberger, P.A.
660 U.S. Highway One, Third Floor
North Palm Beach, FL 33408
Tel.: 561-627-8100
Fax. 561-622-7603
gwoodfield@haileshaw.com
bpetroni@haileshaw.com
eservices@haileshaw.com
Attorneys for Defendant, Frank Avellino

Thomas M. Messina, Esq.
Messana, P.A.
401 East Las Olas Boulevard, Suite 1400
Fort Lauderdale, FL 33301
Tel.: 954-712-7400
Fax: 954-712-7401
tmessana@messana-law.com
Attorneys for Plaintiff

Jonathan Etra, Esq.
Christopher Cavallo, Esq.
Mark F. Raymond, Esq.
Broad and Cassel
One Biscayne Tower, 21st Floor
2 South Biscayne Boulevard
Miami, FL 33131
Tel.: 305-373-9400
Fax.: 305-373-9443
mraymond@broadandcassel.com
jetra@braodandcassel.com
ccavallo@broadandcassel.com
Attorneys for Defendant, Michael Bienes

By: s/Leonard K. Samuels
Leonard K. Samuels